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Attorneys for Plaintiff
Zim Integrated Shipping Services, Ltd.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ZIM INTEGRATED SHIPPING SERVICES, LTD.,

Plaintiff,

Case No. 07-civ-5861 (RMB)

- against -

BELCO RESOURCES, INC., SINOCHEN
JIANGSU CORPORATION (FORMERLY KNOWN
AS SINOCHEN JIANGSU IMPORT & EXPORT
CORPORATION), NANJING HUABIN FOREIGN
TRADE & ECONOMICS CO., LTD.,
DRAGONTRANS SHIPPING LTD. d/b/a
HUABANG INTERNATIONAL, INC.,
SINOTRANS NINGBO INTERNATIONAL
FORWARDING AGENCY CO., LTD.,
JOHN DOE 1-10,

NOTICE OF MOTION

Defendants.

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PLEASE TAKE NOTICE that Plaintiff, ZIM INTEGRATED SHIPPING SERVICES, LTD. ("Zim") will, by its attorneys DeOrchis & Partners, LLP, upon the accompanying Memorandum of Law and Exhibits thereto move this Court before the Honorable Richard M. Berman on October 1, 2004, for an Order reversing the Court's Order & Decision entered on May 5, 2008, insofar as it dismisses the second and third causes of action of Zim's second amended complaint.

PLEASE TAKE FURTHER NOTICE that you shall serve any answering memoranda within seven (7) days after service of the moving papers pursuant to the Court's endorsed order.

Dated: New York, New York
May 15, 2008

DEORCHIS, & PARTNERS, LLP
Attorneys for Plaintiff
Zim Integrated Shipping Services, Ltd.

By: s/ _____
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